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United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 21, 2020

Via Email

The Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl Street, Courtroom 14C New York, New York 10007

MEMO ENDORSED

Re: United States v. Carlos Betances Luna Mera, S1 18 Cr. 407 (KMW)

Dear Judge Wood:

The Government writes to request that the Court unseal the filings in this case. On or about October 2, 2019, the defendant pleaded guilty pursuant to a cooperation agreement with the Government. The Government anticipates that the defendant will testify in the trial in *United States v. Joshua Adam Schulte*, S2 17 Cr. 548 (PAC), likely as early as February 24, 2020. Accordingly, there is no longer a basis to keep the case sealed, and the Government respectfully submits that unsealing is appropriate.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

y: _____/s/

David W. Denton, Jr. Sidhardha Kamaraju Matthew Laroche

Assistant United States Attorneys Tel.: 212-637-2744 / 6523 / 2420

Cc: Defense Counsel (via Email)

2-25-20 SO ORDERED: N.Y., N.Y.

KIMBA M. WOOD U.S.D.J.